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12 Attorneys for
13 MARC L. ABRAMOWITZ

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 *In re Ex Parte* Application of
18 PALANTIR TECHNOLOGIES INC.,

19 Applicant,

20 For an Order Pursuant to 28 U.S.C. § 1782 to
Obtain Discovery from MARC L.
21 ABRAMOWITZ for Use in Foreign
Proceedings.

CASE NO.: 3:18-mc-80132-JSC

**DECLARATION OF STEPHEN L.
WOHLGEMUTH IN SUPPORT OF
SUR-REPLY TO PALANTIR'S *EX
PARTE* APPLICATION FOR AN
ORDER PURSUANT TO 28 U.S.C. §
1782 GRANTING LEAVE TO OBTAIN
DISCOVERY FOR USE IN FOREIGN
PROCEEDINGS**

1 I, Stephen L. Wohlgemuth, hereby declare as follows:

2 1. I am an attorney at the law firm of Williams & Connolly LLP, which is counsel of
3 record for Marc L. Abramowitz (“Abramowitz”) in the above-captioned matter. I make this
4 declaration based on my own personal knowledge, and if called upon to do so, could and would
5 testify competently thereto. I make this declaration in support of Abramowitz’s Sur-Reply to
6 Palantir Technologies Inc.’s (“Palantir”) *Ex Parte* Application for an Order Pursuant to 28 U.S.C. §
7 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings (“*Ex Parte*
8 Application”).

9 2. Attached hereto as **Exhibit K** is a true and correct copy of portions of the Court
10 Reporter’s Transcript of Proceedings from the May 18, 2018 Hearing in *Palantir Technologies Inc.*
11 *v. Marc L. Abramowitz, et al.*, in the Superior Court of the State of California for the County of
12 Santa Clara (Case No. 16-cv-299476)(the “California Action”).

13 3. Attached hereto as **Exhibit L** is a true and correct copy of portions of Palantir’s
14 Pretrial Brief, filed on June 30, 2017, in the Court of Chancery of the State of Delaware.

15 4. Attached hereto as **Exhibit M** is a true and correct copy of portions of Palantir’s
16 Brief in Support of its Motion to Dismiss for Failure to State a Claim, filed on February 16, 2018,
17 in the Superior Court of the State of Delaware.

18 5. Attached hereto as **Exhibit N** is a true and correct copy of portions of Palantir’s
19 Opposition to Defendants’ Motion for a Protective Order, filed on January 16, 2018, in the
20 California Action.

21 6. Attached hereto as **Exhibit O** is a true and correct copy of portions of the Case
22 Management Statement, filed on August 20, 2018, in the Superior Court of the State of California.

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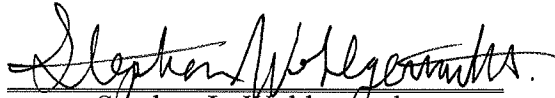
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on September 28, 2018 in Washington, D.C.

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6 Stephen L. Wohlgenuth
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